



## **PH2\_24**

given that both Allocations and Commitments are now considered under the same policy. This also needs to be urgently clarified.

In terms of the above, we envisage this situation could cause significant issues with the JHLAS system. The Council cannot be allowed to include Housing Commitments in the JHLAS process if they do not have planning permission or are subject to Section 106. This would be contrary to national guidance as they are not allocations that have been subject to the necessary scrutiny through the LDP process.

It is essential to ensure that a new category of 'approved' housing sites is not created within the plan, which could have serious implications to the way in which the JHLAS operates. This situation could impact on the soundness of the Plan, given that the Housing Allocations and Commitments policy would essentially conflict with the requirements of national guidance with respect to the JHLAS process.

In light of the above, it would be more appropriate to completely distinguish between Housing Allocations and Housing Commitments in the LDP, so that everyone is clear as to their role and remit.

We would welcome the Inspector's views on these important issues.

**End.**

**Richard Price**

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The Home Builders Federation